

JAP:TF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

SHARON MARIE MONTALVO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOHN MOLONEY, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about April 3, 2011, within the Eastern District of New York and elsewhere, defendant SHARON MARIE MONTALVO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about April 3, 2011, SHARON MARIE MONTALVO arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Avianca Flight 42 from Medellin, Columbia, originating in Cali, Columbia.

2. Defendant SHARON MARIE MONTALVO was selected for a Customs and Border Protection ("CBP") examination. She presented one large, red "Concourse" suitcase and one small, red "Concourse" carry-on suitcase for inspection, and identified both suitcases and their contents as her own. During a routine inspection, an officer noticed that a laptop computer in the large suitcase was unusually heavy and emitted a strange odor. Subsequent inspection revealed packages inside the laptop computer as well as inside a mouse, charger, and external hard drive. Probing of one such package revealed a brown powdery substance that field-tested positive for heroin.

3. The total approximate gross weight of the heroin found in the laptop, mouse, charger, and external hard drive in defendant SHARON MARIE MONTALVO's suitcase is 1,167.8 grams. The defendant was placed under arrest.

WHEREFORE, your deponent respectfully requests that

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

defendant SHARON MARIE MONTALVO be dealt with according to law.

John M. Moloney
JOHN MOLONEY
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
4th day of April, 2011

HONORABLE
UNITED STATES
EASTERN

S/ Carter

JR.
GE